

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

United States of America,

Case No. 25-cv-48 (ADM/DLM)

Plaintiff,

**DECLARATION OF MICHELLE
GROSS IN SUPPORT OF MOTION FOR
LEAVE TO PARTICIPATE AS AMICUS
CURIAE**

vs.

City of Minneapolis,

Defendant.

I, Michelle Gross, state and affirm as follows:

1. My name is Michelle Gross, and I am the President of Communities United Against Police Brutality (“CUAPB”), which is a Minnesota non-profit corporation that has been dedicated to police reform since its formation in 2000.
2. CUAPB was one of a coalition of organizations that wrote the initial letter to the United States Department of Justice (“DOJ”) requesting an investigation into the City of Minneapolis (the “City”) and the Minneapolis Police Department (“MPD”) in 2020.
3. Once CUAPB learned that the DOJ would be proceeding with the requested investigation, CUAPB held two dozen community forums to educate the community on the investigation and the potential consent decree, and to gather community input into what should be included in a consent decree.
4. From that voluminous input, CUAPB developed a “people’s consent decree,” and shared that information with the DOJ.

5. CUAPB also hired dozens of canvassers to distribute hundreds of thousands of fliers about the DOJ investigation and potential consent decree in neighborhoods across the City.
6. In addition, CUAPB interviewed people and collected more than 2,300 “experiences”—stories that people shared regarding their encounters with MPD officers.
7. CUAPB provided these to the DOJ and the Minnesota Department of Human Rights (“MDHR”) in order to inform each agency’s investigation.
8. CUAPB also hosted hearings with DOJ investigators and filed a separate complaint regarding MPD officers’ treatment of people experiencing mental health crises.
9. CUAPB is participating as amicus curiae in the court-enforceable agreement between the MDHR and the City.
10. CUAPB has worked closely with the Independent Evaluator in connection with that agreement, providing ongoing evaluation and recommendations regarding proposed MPD policies as well as regular updates from the community or community’s perspective.
11. Since its formation in 2000, CUAPB has been working in the areas of policy reform, education, victim support, case reinvestigation, government data practices and analysis, and legal and legislative advocacy.
12. More than twenty-four years of experience in this cross-disciplinary approach to police reform puts CUAPB in a singular position to analyze the proposed Settlement Agreement in the above-titled matter.
13. For example, CUAPB helped form a coalition called “MPLS for a Better Police Contract” in 2020, has carefully reviewed the prior four labor contracts between the

Police Federation and the City, and initiated litigation to open negotiation sessions between those parties to the public.

14. CUAPB is therefore well-qualified to address the interaction between labor contracts and the Settlement Agreement in the above-titled matter.
15. CUAPB has also collected MPD civilian complaint data through requests pursuant to the Minnesota Government Data Practices Act (“MGDPA”), and disseminated such information through its website for many years, long before the City began a more limited distribution of similar data.
16. As a result, CUAPB has a depth of background knowledge that will assist the Court in its decision regarding approval of the Settlement Agreement in the above-titled matter.
17. In addition, CUAPB has worked with volunteer attorneys for years, not only to witness labor negotiations with the Police Federation and enforce the MGDPA, but to represent victims of police violence.
18. As a result, CUAPB is in an excellent position to ensure that the community will be represented by attorneys prepared to advocate for the community’s interests.
19. Finally, CUAPB is based in Minneapolis, and its geographic placement has led the organization to spend much of its energy involved in Minneapolis policing.
20. For example, CUAPB board members met with prior MPD Chief of Police Medaria Arradondo on a monthly basis.
21. CUAPB is intimately familiar with the MPD and has been for more than 24 years.

I declare under penalty of perjury that everything I have stated in this declaration is true and correct. Signed in Hennepin County, Minnesota.

Dated: January 6, 2025

/s/ Michelle Gross
Michelle Gross